

Kirsten,

We you please review this permit, I believe it is incorrect. It was one completed by CO. The facility/city normally has recreational parameters for FC & CLTRC. Previous (attached).
As is it makes Rockaway Beach appear to be in noncompliance since they have continued reporting the old permit parameters, O & G was also added to new. They omitted this, but will send O & G next time.

Lana.

I conferred with Lana on this to find out if my assumptions were correct.

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

www.dnr.mo.gov

August 10, 2007

NOTICE OF VIOLATION 12148SW

Honorable Larry Cline, Mayor
City of Rockaway Beach
PO Box 315
Rockaway Beach, MO 65740

Dear Mayor Cline:

This letter is in response to several recent environmental concerns filed with the department. The concerns all involve odor problems and the possible operational or design concerns at the wastewater treatment facility that may be causing these issues.

Staff from our office has been on site on numerous occasions in the past few months to investigate these environmental concerns. Findings from our investigations have led to the discovery of an incorrect electrical connection for one of the blower motors which has since been corrected. Other concerns remain about the sludge levels in the aeration basin as well as the design criteria and capacity of the aeration system now in place within the aeration basin.

During site visits on May 10, 2007 and July 11, 2007 samples were taken by department staff. Also, find enclosed a Report of Laboratory Analysis for samples collected during the site visits. A Notice of Violation number 12148SW is enclosed for effluent limit violations of Missouri State Operating Permit (MSOP) MO-0108162. The results are summarized as follows:

SITE VISIT DATE	PARAMETER	OUTFALL	PERMIT LIMIT	REPORTED VALUE
5/10/2007	Biochemical Oxygen Demand	001	20 mg/L monthly avg. 30 mg/L weekly avg.	21.5 mg/L
5/10/2007	Total Suspended Solids	001	20 mg/L monthly avg. 30 mg/L weekly avg.	80 mg/L
5/10/2007	Ammonia as N	001	6.0 mg/L monthly avg. 12.1 mg/L daily max.	39.5
5/10/2007	Total Phosphorous	001	0.5 mg/L monthly avg.	6.4 mg/L
5/10/2007	Fecal Coliform	001	400 colonies/100mL monthly avg. 1000 colonies/100 mL daily max.	17,600 colonies/100 mL
7/11/2007	Biochemical Oxygen Demand	001	20 mg/L monthly avg. 30 mg/L weekly avg.	22 mg/L
7/11/2007	Total Suspended Solids	001	20 mg/L monthly avg. 30 mg/L weekly avg.	22 mg/L
7/11/2007	Total Phosphorous	001	0.5 mg/L monthly avg.	1.82 mg/L
7/11/2007	Fecal Coliform	001	400 colonies/100mL monthly avg. 1000 colonies/100 mL daily max.	23,000 colonies/100 mL

Recycled Paper

FILE



MISSOURI DEPARTMENT OF NATURAL RESOURCES
NOTICE OF VIOLATION

VIOLATION NUMBER

12148SW

DATE AND TIME ISSUED

8/10/2007

12:00:00 PM

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)

City of Rockaway Beach

1000 Boys Camp Road, Rockaway Beach, MO 65740

MO-0108162

SE 1/4, SE 1/4, Sec. 11, T23N, R21W, Taney County River Reach (11010003-010006)

MAILING ADDRESS

PO Box 315

CITY

Rockaway Beach

STATE

MO

ZIP CODE

65740

NAME OF OWNER OR MANAGER

Larry Cline

TITLE OF OWNER OR MANAGER

Mayor

LAW, REGULATION OR PERMIT VIOLATED

Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo.

Missouri Clean Water Commission Regulations 10 CSR 20-7.015(9)(A) and 10 CSR 20-9.010(5)

NATURE OF VIOLATION

DATE(S):

TIME(S):

Permittee failed to comply with effluent limits contained in Part "A" of National Pollutant Discharge Elimination System (NPDES) permit number MO0108162. Permittee exceeded effluent limitations of Biochemical Oxygen Demand, Total Suspended Solids, Total Phosphorous, Ammonia as N and Fecal Coliform on May 10, 2007 and July 11, 2007, as sampled by department staff.

Permittee has failed to properly operate and maintain the facility by allowing the sand filter to be taken out of service for a period of time.

Permittee has failed to conduct all operational testing as required by the above noted regulation.

SIGNATURE (PERSON RECEIVING NOTICE)

Sent Via US Mail

SIGNATURE (PERSON ISSUING NOTICE)

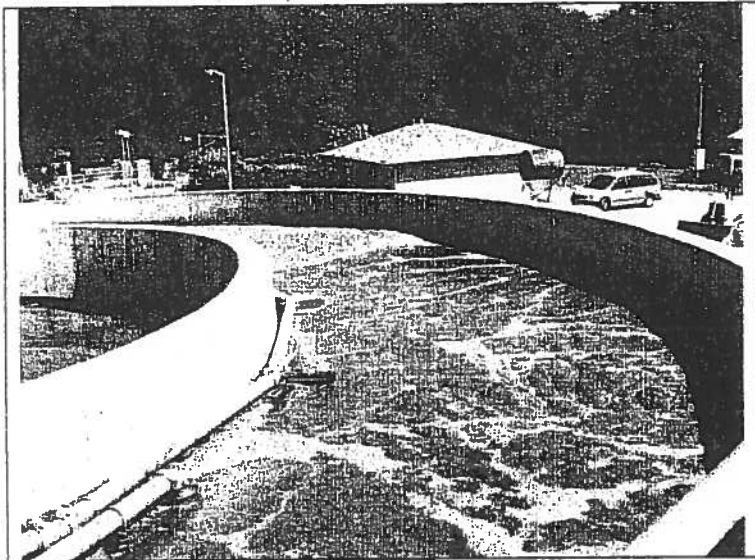
Tina White

TITLE OR POSITION

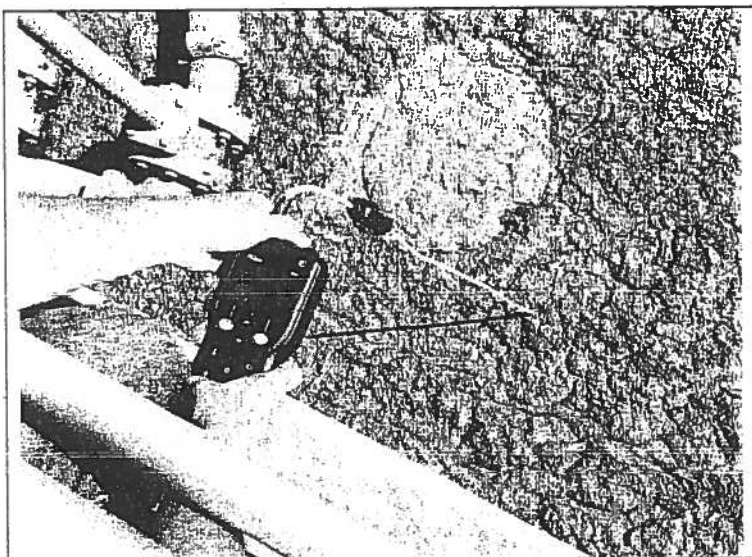
TITLE OR POSITION

Environmental Specialist/SWRO

DISTRIBUTION: SOURCE CENTRAL OFFICE REGIONAL OFFICE



Location: Rockaway Beach WWTf
Photographer: Tina White
Photograph Date: July 11, 2007
Direction of View: Northeast
Comments: Aeration basin

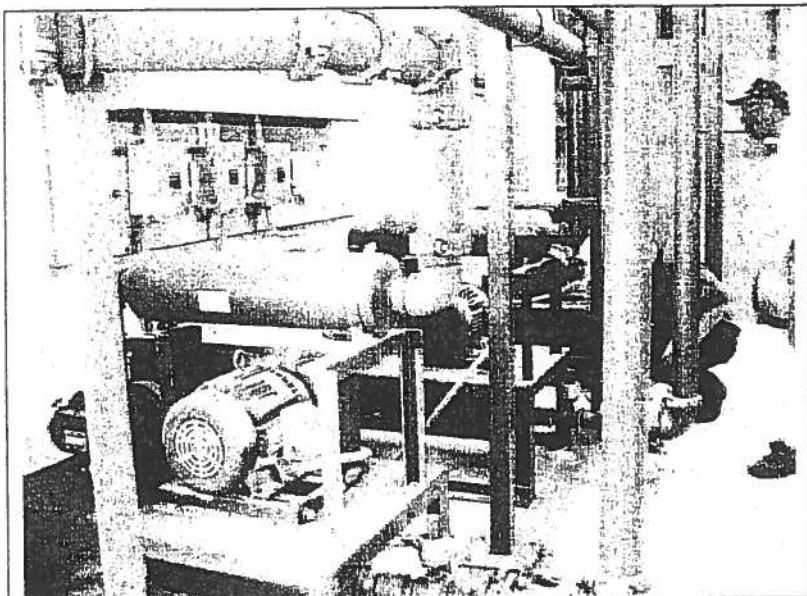


Location: Rockaway Beach WWTf
Photographer: Tina White
Photograph Date: July 11, 2007
Comments: Aeration basin, DO Meter reading 0.12

Rockaway Beach

August 10, 2007

Page 4

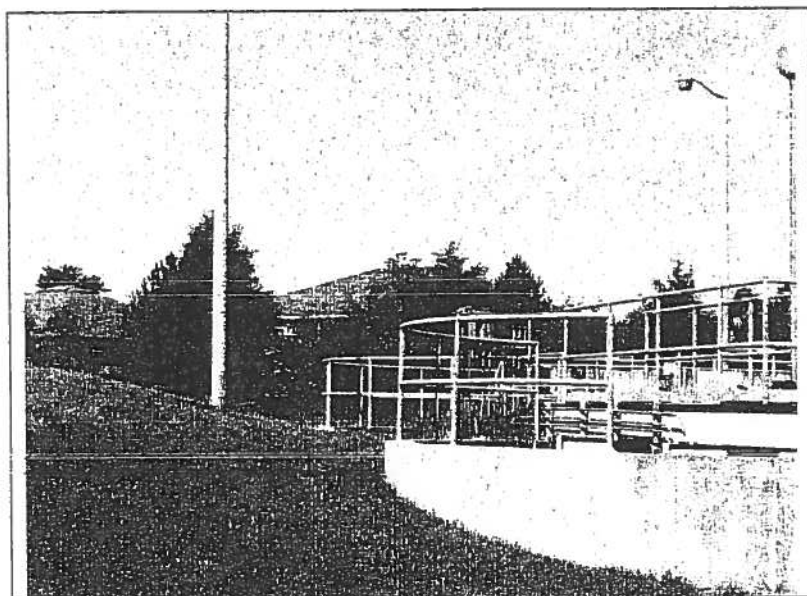


Location: Rockaway Beach WWTF

Photographer: Tina White

Photograph Date: July 11, 2007

Comments: Blower Motors inside the plant.



Location: Rockaway Beach WWTF

Photographer: Tina White

Photograph Date: July 11, 2007

Direction of View: Northeast

Comments: Vicinity of homes in the area to the WWTF



CONSULTING ANALYTICAL SERVICES INTERNATIONAL, INC.

2804 EAST BATTLEFIELD • SPRINGFIELD, MISSOURI 65804-4014 • 417.882.1017 • 417.882.1018

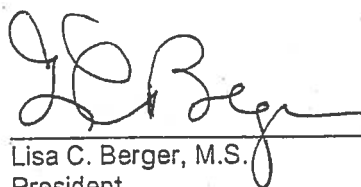


MISSOURI DEPARTMENT OF NATURAL RESOURCES
2040 West Woodland
Springfield, Missouri 65807

May 25, 2007
Page 8

Attention: Mr. Kevin Hess

CaSi File/Case/Log Number	0670/071341/2123
Site	Rockaway Beach WWTF
Sample Identity	0704278
Permit Number	MO-0108162
Collection Date/Time	05-10-07, 14:20
Receipt in Lab Date/Time	05-10-07, 16:15
Collector's Initials	DL
Sample Treatment/Preservative	UV/Na ₂ S ₂ O ₃ /Ice
Analysis Initiated Date/Time	05-10-07, 16:55
Analysis Complete Date/Time	05-11-07, 15:17
Fecal Coliform, CFU/100 milliliters	17,600
Method	SM 9222 D
Comments	

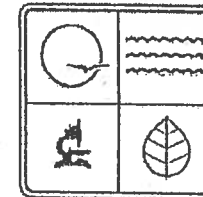

Lisa C. Berger, M.S.
President

05-29-07
Date



Missouri Department of Natural Resources

Environmental Services Program



Order ID: 070511001

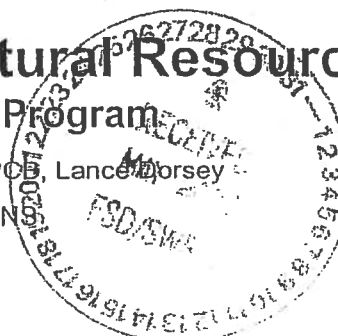
Report Date: 5/23/2007

Order Comment:

Program, Contact: WPCB, Lance Dorsey

LDPR:

FEIN:



Sample: 070511001-01

Facility ID: MO0108162

Site: City of Rockaway Beach

Customer #: 0704285

County: Taney

Sample Reference ID:

Collect Date: 5/10/2007



Collector: Dan Leyland

Affiliation: SWRO

Collect Time: 2:30 PM

Matrix: Nonpotable Water

Sample Comment: Ext. Aeration, oxidation ditch, clarifier, UV, phosphorus reduction, sludge holding. Grab.

Test	Parameter	Result	Qualifier	Units	QC BatchID	Method
Ammonia as N	Ammonia as N	39.5	09	mg/L	Q70517-04	EPA 350.1
Biochemical Oxygen Demand	Biochemical Oxygen Demand	21.5		mg/L	Q70516-02	SM 5210-B
Non-Filterable Residue	Non-Filterable Residue	80.0		mg/L	Q70515-06nfr	SM 2540-D
Total Phosphorus	Total Phosphorus	6.64		mg/L	Q70516-01	EPA 365.4

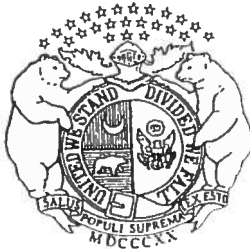
The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S. Environmental Protection Agency.

Qualifier Descriptions

- | | |
|---|---|
| 01 Improper collection method | 11 Estimated value, matrix interference |
| 02 Improper preservation | 12 Insufficient quantity |
| 03 Exceeded holding time | 13 Estimated value, true result is > reported value |
| 04 Analyzed by Contract Laboratory | 14 Estimated value, non-homogeneous sample |
| 05 Estimated value, detected below PQL | 15 No Result - Failed Quality Controls Requirements |
| 06 Estimated value, QC data outside limits | 16 Not analyzed - related analyte not detected |
| 07 Estimated value, analyte outside calibration range | 17 Results in dry weight |
| 08 Analyte present in blank at > 1/2 reported value | 18 Sample pH is outside the acceptable range |
| 09 Sample was diluted during analysis | 19 Estimated value |
| 10 Laboratory error | ND Not detected at reported value |

Connie Giesing

Connie Giesing, Laboratory Manager
Environmental Services Program
Field Services Division



Missouri Department of Natural Resources

Environmental Services Program

Order ID: 070712004

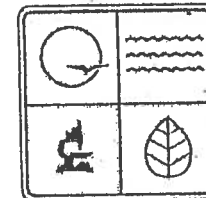
Report Date: 7/26/2007

Order Comment:

Program, Contact: WPCB, Lance Dorsey

LDPR: FEINS

RECEIVED
JUL 26 2007
FSD/SWRO



Sample: 070712004-01

Facility ID: MO0108162

Site: City of Rockaway Beach

Customer #: 0705639

County: Taney

Sample Reference ID:

Collect Date: 7/11/2007

Collector: Tina White

Affiliation: SWRO

Collect Time: 10:25 AM



Matrix: Nonpotable Water

Sample Comment: Effluent monitoring point after filters and UV-used dipper.

Test	Parameter	Result	Qualifier	Units	QC BatchID	Method
Biochemical Oxygen Demand	Biochemical Oxygen Demand	22.0		mg/L	Q70718-02bod	SM 5210-B
Non-Filterable Residue	Non-Filterable Residue	22.0		mg/L	Q70718-01	SM 2540-D
Total Phosphorus	Total Phosphorus	1.82		mg/L	Q70724-04	EPA 365.4

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S. Environmental Protection Agency.

Qualifier Descriptions

- | | |
|---|---|
| 01 Improper collection method | 11 Estimated value, matrix interference |
| 02 Improper preservation | 12 Insufficient quantity |
| 03 Exceeded holding time | 13 Estimated value, true result is > reported value |
| 04 Analyzed by Contract Laboratory | 14 Estimated value, non-homogeneous sample |
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Connie Giesing

Connie Giesing, Laboratory Manager
Environmental Services Program
Field Services Division



Missouri Department of Natural Resources

Environmental Services Program

Order ID: 070712004

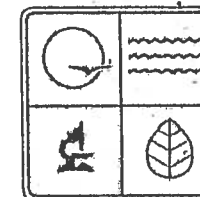
Report Date: 7/26/2007

Order Comment:

Program, Contact: WPCB, Lance Dorsey

LDPR: FEINS

RECEIVED
JUL 26 2007
FSD/SWRO



Sample: 070712004-01

Facility ID: MO0108162

Site: City of Rockaway Beach

Customer # : 0705639

County: Taney

Sample Reference ID:

Collect Date: 7/11/2007



Collector: Tina White

Affiliation: SWRO

Collect Time: 10:25 AM

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Connie Giesing

Connie Giesing, Laboratory Manager
Environmental Services Program
Field Services Division

APPENDIX 7
DATA INPUT SHEET FOR WQIS
INSPECTIONS

Facility Name: City of Rockaway Beach
 Permit number: WD-0108162 Outfall: 001
 Legal Description: SE 1/4, SE 1/4, Sec 11, T23N, R21W River Reach: 11010003-010006
 City Name: Rockaway Beach County: Taney ROP: SWRO Inspector: Tina White / Danke
 Inspection Date: 7-11-07 WQIS Input Date: _____

Type of Inspection (check only one).

CS _____ Comprehensive inspection, sample taken (I & E Manual's Class 3 inspection)
 CE _____ Comprehensive inspection, no sample taken (I & E Manual's Class 3 inspection)
 AI _____ Abbreviated inspection (I & E Manual's Class 2 inspection)
 CP ☒ Inspection or investigation in response to a complaint.

INSPECTION DATA (check all that apply).

CO _____ Facility in compliance
 NCO ☒ Facility not in compliance
 NOCP _____ No Construction Permit
 CTOP _____ Certified operator is required but not employed
 ELV ☒ Facility is not meeting effluent limits based on DMR's or recent sampling
 BYP _____ Evidence of bypassing at facility or in collection system
 NOLA _____ Class I facility is operating without the required LOA/permit
 NOPT _____ Facility is discharging without a permit (includes land application facilities)
 SCV _____ Schedule of compliance is not being met.
 REV _____ Reporting (e.g. DMR) or other standard conditions not being met.
 SDV _____ Sludge disposal standard violation.
 SIC _____ Sludge or solids were observed in creek or around outfall.
 SOP _____ Stream has other observable problems due to this discharge.
 SWOP _____ No stormwater outfalls permitted.
 HBF _____ Holding basin is within one foot of overflow from a no-discharge system.
 LL _____ Lagoon is leaking based on geologic evaluation or water balance information.
 LAV _____ Wastewater irrigation problems.
 SDP _____ Sludge disposal problems.
 PTV _____ Pretreatment problems.
 OMP _____ Operation and maintenance problems.
 SNO _____ Stream was not observed during inspection.
 OT _____ Other (Specify)

COMPLIANCE TRACKING (complete all that apply).

NOVR1 ☒ Notice of Violation issued on: 8/10/07
 RRER2 _____ Facility owner directed to submit DMR's, engineering report,
 plans and specifications, construction permit, etc. by: / /
 FRCR3 _____ Facility owner directed to return to compliance by: / /
 OTRR4 _____ Other; describe below; response date is: / /
 VIR5 _____ Follow-up visit/inspection scheduled for: / /



MISSOURI DEPARTMENT OF NATURAL RESOURCES
NOTICE OF VIOLATION

VIOLATION NUMBER

12148SW

DATE AND TIME ISSUED

8/10/2007

12:00:00 PM

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)

City of Rockaway Beach

1000 Boys Camp Road, Rockaway Beach, MO 65740

MO-0108162

SE 1/4, SE 1/4, Sec. 11, T23N, R21W, Taney County River Reach (11010003-010006)

MAILING ADDRESS

PO Box 315

CITY

Rockaway Beach

STATE

MO

ZIP CODE

65740

NAME OF OWNER OR MANAGER

Larry Cline

TITLE OF OWNER OR MANAGER

Mayor

LAW, REGULATION OR PERMIT VIOLATED

Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo.

Missouri Clean Water Commission Regulations 10 CSR 20-7.015(9)(A) and 10 CSR 20-9.010(5)

NATURE OF VIOLATION

DATE(S):

TIME(S):

Permittee failed to comply with effluent limits contained in Part "A" of National Pollutant Discharge Elimination System (NPDES) permit number MO0108162. Permittee exceeded effluent limitations of Biochemical Oxygen Demand, Total Suspended Solids, Total Phosphorous, Ammonia as N and Fecal Coliform on May 10, 2007 and July 11, 2007, as sampled by department staff.

Permittee has failed to properly operate and maintain the facility by allowing the sand filter to be taken out of service for a period of time.

Permittee has failed to conduct all operational testing as required by the above noted regulation.

SIGNATURE (PERSON RECEIVING NOTICE)

Sent Via US Mail

SIGNATURE (PERSON ISSUING NOTICE)

Tina White

TITLE OR POSITION

TITLE OR POSITION

Environmental Specialist/SWRO

DISTRIBUTION: SOURCE CENTRAL OFFICE REGIONAL OFFICE

August 10, 2007

NOTICE OF VIOLATION 12148SW

Honorable Larry Cline, Mayor
City of Rockaway Beach
PO Box 315
Rockaway Beach, MO 65740

Dear Mayor Cline:

This letter is in response to several recent environmental concerns filed with the department. The concerns all involve odor problems and the possible operational or design concerns at the wastewater treatment facility that may be causing these issues.

Staff from our office has been on site on numerous occasions in the past few months to investigate these environmental concerns. Findings from our investigations have led to the discovery of an incorrect electrical connection for one of the blower motors which has since been corrected. Other concerns remain about the sludge levels in the aeration basin as well as the design criteria and capacity of the aeration system now in place within the aeration basin.

During site visits on May 10, 2007 and July 11, 2007 samples were taken by department staff. Also, find enclosed a Report of Laboratory Analysis for samples collected during the site visits. A Notice of Violation number 12148SW is enclosed for effluent limit violations of Missouri State Operating Permit (MSOP) MO-0108162. The results are summarized as follows:

SITE VISIT DATE	PARAMETER	OUTFALL	PERMIT LIMIT	REPORTED VALUE
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5/10/2007	Total Suspended Solids	001	20 mg/L monthly avg. 30 mg/L weekly avg.	80 mg/L
5/10/2007	Ammonia as N	001	6.0 mg/L monthly avg. 12.1 mg/L daily max.	39.5
5/10/2007	Total Phosphorous	001	0.5 mg/L monthly avg.	6.4 mg/L
5/10/2007	Fecal Coliform	001	400 colonies/100mL monthly avg. 1000 colonies/100 mL daily max.	17,600 colonies/100 mL
7/11/2007	Biochemical Oxygen Demand	001	20 mg/L monthly avg. 30 mg/L weekly avg.	22 mg/L
7/11/2007	Total Suspended Solids	001	20 mg/L monthly avg. 30 mg/L weekly avg.	22 mg/L
7/11/2007	Total Phosphorous	001	0.5 mg/L monthly avg.	1.82 mg/L
7/11/2007	Fecal Coliform	001	400 colonies/100mL monthly avg. 1000 colonies/100 mL daily max.	23,000 colonies/100 mL

City of Rockaway Beach
August 10, 2007
Page 2

At the time of the first inspection the sand filter was not in operation. The failure to keep this component in service constitutes a violation of Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo, for which Notice of Violation number 12148SW is also being issued.

The City of Rockaway Beach has failed to conduct all operational testing as required by 644.076.1 RSMo, and 10 CSR 20-9.020(5) for which Notice of Violation number 12148SW is also being issued. This laboratory testing is used to ensure adequate wastewater systems in-plant operational control to keep the facility in compliance with MSOP limitations and to determine if design parameters have been exceeded.

In an effort to seek a solution to the on-going odor and effluent exceedance issues at the Rockaway Beach Wastewater Treatment Facility, the department requests that the city retain the services of an engineer registered in the State of Missouri to evaluate the wastewater treatment facility and its ability to comply with MSOP limitations and conditions. The City of Rockaway Beach must also properly operate and maintain the wastewater treatment facility.

Please respond to the department by August 24, 2007 of the cities intent to address remaining concerns. Please provide the requested engineering evaluation no later than October 1, 2007. If you have questions, please contact Ms. Tina White, by calling 417-891-4300 or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Kevin Hess, Chief
Water Pollution Section

KH/lcc

Enclosure

c: Ms. Catherine Hodges, Water Pollution Compliance & Enforcement Section
Mr. Edwin Godley, Operator

City of Rockaway Beach
August 10, 2007
Page 3



Location: Rockaway Beach WWTf
Photographer: Tina White
Photograph Date: July 11, 2007
Direction of View: Northeast
Comments: Aeration basin

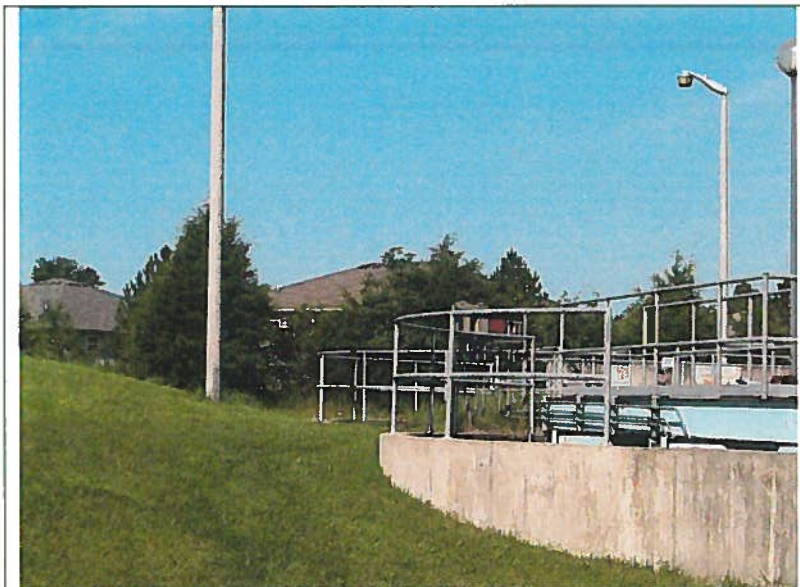


Location: Rockaway Beach WWTf
Photographer: Tina White
Photograph Date: July 11, 2007
Comments: Aeration basin, DO Meter reading 0.12

Rockaway Beach
August 10, 2007
Page 4



Location: Rockaway Beach WWTF
Photographer: Tina White
Photograph Date: July 11, 2007
Comments: Blower Motors inside the plant.



Location: Rockaway Beach WWTF
Photographer: Tina White
Photograph Date: July 11, 2007
Direction of View: Northeast
Comments: Vicinity of homes in the area to the WWTF

Joe Joslin/R7/USEPA/US

09/20/2007 06:29 AM

To "Gregory Perkins" <gregory.perkins@dnr.mo.gov>

cc

bcc

Subject Re: Fw: Rockaway Beach, MO WWTF

Will put it in the mail today. You should have already received the NOPV which gives a good rundown of all that is wrong. I am very suspicious of the sludge disposal. I believe that some quantity is unaccounted for. Along that line, please have sent to me the sludge reports for years 2002, 2003, 2004, 2005, if you have them. I have the figures for 2006 that suggests only 7.5 dry ton were hauled. I talk about Al West and his automatic waster, sludge coming to equal balance by burps over the clarifier weir. The condition of the filters and the UV channel suggest thats happening, perhaps a lot. Please keep me informed. Oh yes, during my exit interview with the mayor, I suggested a new operator and he concurred. He wanted to get with EC to get a list of "good" operators that he could approach.

PS Got another facility you want me to visit? Just kidding!

"Gregory Perkins" <gregory.perkins@dnr.mo.gov>



"Gregory Perkins"
<gregory.perkins@dnr.mo.gov>
v>

09/19/2007 04:34 PM

To Joe Joslin/R7/USEPA/US@EPA

cc "Ernest West" <ernest.west@dnr.mo.gov>, "Kevin Hess"
<kevin.hess@dnr.mo.gov>, "Kristen Pattinson"
<kristen.pattinson@dnr.mo.gov>, "Gale Roberts"
<gale.roberts@dnr.mo.gov>, "Cindy Davies"
<cindy.davies@dnr.mo.gov>

Subject Re: Fw: Rockaway Beach, MO WWTF

E.C. West has spent the last couple of days down at Rockaway Beach providing technical assistance to the operator and city on getting the facility back into operation and compliance. It has become very evident that Buck Godley is not capable of properly operating and maintaining the wastewater treatment facility. I am requesting that you send me a copy of the admission of falsification of Discharge Monitoring Reports. I intend to initiate action against Mr. Godley to remove his certification to operate the wastewater treatment facility.

If you have any questions, please let me know.

Gregory S. Perkins, P.E.
Southwest Regional Office
Water Pollution Engineering Unit
417-891-4300

Joslin.Joe@epamail.epa.gov

09/17/2007 09:23 AM

To gregory.perkins@dnr.mo.gov

cc

Subject Fw: Rockaway Beach, MO WWTF

----- Forwarded by Joe Joslin/R7/USEPA/US on 09/17/2007 09:23 AM -----

Joe
Joslin/R7/USEPA/
US

09/17/2007 07:24
AM

perkins.greg@dnr.mo.gov

To

cc

Subject

Rockaway Beach, MO WWTF

Mailed to you on Friday copy of the NOPV I left with the mayor. He would like to hire a competent operator ASAP. As of noon on last Thursday, the clarifier discharge was still bypassing the sand filter and none of the filters had been cleaned. The 2006 sludge haul figures, 79 loads at 2000 gallon per load and one sludge test of 1.15% solids yields only 7.58 ton if my math is correct. The population census for all served is 1938 but growth estimates bring that number to around 2450. That would suggest a sludge generation of about 45 ton dry solids. I told Mr. Godley that the sludge went one of three places. It was hauled because the sludge was actually heavier than the single measurement, the sludge was still in the basin to be hauled, or the sludge went out the effluent as suggested by the condition of the UV channel and the sand filters being so difficult to operate and being taken out of service. Guess which idea that I support most? The 2450 people and a flow of about 160,000 yield 65 gallon per capita per day. This value is low but not all that low. The mayor was talking about a rate increase, I told him that accurate flow would come into play. I will be suggesting to our people an increased frequency of compliance sampling using composites for both influent and effluent samples with all analysis being done by a contract laboratory. As an assistance project, EC has his work cut out for him. I believe that the air situation should be resolved by a consulting engineer who understands that his solution will stand the test of time and load. As I requested last Tuesday, I will need a copy of the DMR's for the last three years and I would like the 2003, 2004, and 2005 sludge reports. I know that this is a fair amount of work but you know where this is going. Oh yes, you gave me the last NOV with pictures. I will need copies of the last two years inspections, correspondence, etc. This may become a case of the operator just ignoring all direction. Thanks in advance. It was good working with you and your cohorts.



"Gregory Perkins"
<gregory.perkins@dnr.mo.gov>
v>

09/20/2007 08:54 AM

To "Ed Galbraith" <ed.galbraith@dnr.mo.gov>

cc "Rob Morrison" <rob.morrison@dnr.mo.gov>, "Kevin Mohammadi" <kevin.mohammadi@dnr.mo.gov>, "Gordon Belcher" <gordon.belcher@dnr.mo.gov>, "Cindy Davies"

bcc

Subject Fw: Rockaway Beach, MO WWTF

History: This message has been forwarded.

My apologies for not copying each of you on the initial email. Recently, Joe Joslin with EPA conducted an inspection on the City of Rockaway Beach. He set his sampler on Monday September 10 and began his inspection. By the end of that day the operator, Edwin (Buck) Godley, signed a confession that he had been falsifying Discharge Monitoring Reports for an approximate period of 1.5 - 3 years. E.C. West of this office has spent a couple of days down there providing technical assistance and determined that 3 out of 5 motive pumps (part of the aeration system) are out of service. The DO in the ditch has been running 0.3-0.4 mg/l. Settleability in the ditch has been running around 980. The operator says that has been the normal range. The only organisms found under a microscope is filamentous. The sand filter is being bypassed since the backwash pumps are not operable and we are unsure if one bank of the UV system is operational.

Thanks to E.C. we have gotten the City to get the two operating motive pumps installed in the second aeration basin (which hasn't been used in at least 3 years) and the influent is being routed to it. Some bacteria other than filamentous have been observed and the DO is up to 4 and settleability has dropped to the 400 range. The City of Rockaway Beach is interviewing for a new operator with the first being tomorrow.

Mike Potter and a criminal investigator from EPA question Edwin Godley last Thursday. Joe Joslin did respond to the initial email and will be sending the confession in the mail.

Gregory S. Perkins, P.E.
Southwest Regional Office
Water Pollution Engineering Unit
417-891-4300

----- Forwarded by Gregory Perkins/SWRO/FSD/MODNR on 09/20/2007 07:44 AM -----

Gregory

Perkins/SWRO/FSD/MODNR

09/19/2007 04:34 PM

To Joslin.Joe@epamail.epa.gov

Ernest West/SWRO/FSD/MODNR@MODNR, Kevin

Hess/SWRO/FSD/MODNR@MODNR, Kristen

cc Pattinson/SWRO/DEQ/MODNR@MODNR, Gale

Roberts/SWRO/FSD/MODNR@MODNR, Cindy

Davies/SWRO/FSD/MODNR@MODNR

Subject Re: Fw: Rockaway Beach, MO WWTF [Link](#)

E.C. West has spent the last couple of days down at Rockaway Beach providing technical assistance to the operator and city on getting the facility back into operation and compliance. It has become very evident that Buck Godley is not capable of properly operating and maintaining the wastewater treatment facility. I am requesting that you send me a copy of the admission of falsification of Discharge Monitoring

Reports. I intend to initiate action against Mr. Godley to remove his certification to operate the wastewater treatment facility.

If you have any questions, please let me know.

Gregory S. Perkins, P.E.
Southwest Regional Office
Water Pollution Engineering Unit
417-891-4300

Joslin.Joe@epamail.epa.gov

09/17/2007 09:23 AM

To gregory.perkins@dnr.mo.gov

cc

Subject Fw: Rockaway Beach, MO WWTF

----- Forwarded by Joe Joslin/R7/USEPA/US on 09/17/2007 09:23 AM -----

Joe
Joslin/R7/USEPA/
US

09/17/2007 07:24
AM

perkins.greg@dnr.mo.gov

To

cc

Subject

Rockaway Beach, MO WWTF

Mailed to you on Friday copy of the NOPV I left with the mayor. He would like to hire a competent operator ASAP. As of noon on last Thursday, the clarifier discharge was still bypassing the sand filter and none of the filters had been cleaned. The 2006 sludge haul figures, 79 loads at 2000 gallon per load and one sludge test of 1.15% solids yields only 7.58 ton if my math is correct. The population census for all served is 1938 but growth estimates bring that number to around 2450. That would suggest a sludge generation of about 45 ton dry solids. I told Mr. Godley that the sludge went one of three places. It was hauled because the sludge was actually heavier than the single measurement, the sludge was still in the basin to be hauled, or the sludge went out the effluent as suggested by the condition of the UV channel and the sand filters being so difficult to operate and being taken out of service. Guess which idea that I support most? The 2450

people and a flow of about 160,000 yield 65 gallon per capita per day. This value is low but not all that low. The mayor was talking about a rate increase, I told him that accurate flow would come into play. I will be suggesting to our people an increased frequency of compliance sampling using composites for both influent and effluent samples with all analysis being done by a contract laboratory. As an assistance project, EC has his work cut out for him. I believe that the air situation should be resolved by a consulting engineer who understands that his solution will stand the test of time and load. As I requested last Tuesday, I will need a copy of the DMR's for the last three years and I would like the 2003, 2004, and 2005 sludge reports. I know that this is a fair amount of work but you know where this is going. Oh yes, you gave me the last NOV with pictures. I will need copies of the last two years inspections, correspondence, etc. This may become a case of the operator just ignoring all direction. Thanks in advance. It was good working with you and your cohorts.